

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

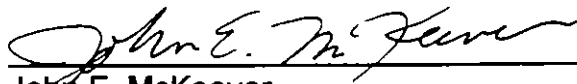
DOCKET NO. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SECOND SET OF INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS FROM UNITED
PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS RALPH J. MODEN
(UPS/USPS-T4-2 through UPS/USPS-T4-9)

(August 1, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents on United States Postal Service witness Ralph J. Moden (UPS/USPS-T4-2 through UPS/USPS-T4-9).

Respectfully submitted,


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**INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MODEN**

UPS/USPS-T4-2. On page 4 of your testimony at lines 2-3, you state that Section II of your testimony "provide[s] an overview of [the Postal Service's] operations as they relate to the processing of letters and flats." Please provide a similar overview of the Postal Service's operations as they relate to the processing of:

- (a) Packages carried as part of Parcel Post;
- (b) To the extent the operations differ from those for Parcel Post, packages carried as part of Standard (B) Special;
- (c) To the extent the operations differ from those for Parcel Post, Standard (B) mail carried as Bound Printed Matter; and
- (d) To the extent the operations differ from those for Parcel Post, Standard (B) mail carried as Library Rate mail.

UPS/USPS-T4-3. (a) To what extent has the volume of barcoded Parcel Post packages increased or decreased for each year from FY 1991 up to and including FY 1996?

(b) To what extent has the volume of prebarcoded Parcel Post packages increased or decreased for each year from FY 1991 up to and including FY 1996?

UPS/USPS-T4-4. (a) To what extent has the volume of barcoded Priority Mail packages increased or decreased for each year from FY 1991 up to and including FY 1996?

(b) To what extent has the volume of prebarcoded

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Priority Mail packages increased or decreased for each year from FY 1991 up to and including FY 1996?

UPS/USPS-T4-5. (a) To what extent has the volume of barcoded Express Mail packages increased or decreased for each year from FY 1991 up to and including FY 1996? (b) To what extent has the volume of prebarcoded Express Mail packages increased or decreased for each year from FY 1991 up to and including FY 1996?

UPS/USPS-T4-6. Please describe all differences in the handling and processing, from collection through delivery, and in transportation between (a) Priority Mail Flat Rate Envelopes on the one hand and (b), on the other hand, Priority Mail packages.

UPS/USPS-T4-7. Please provide an update on the equipment used to apply and/or sort barcodes for Parcel Post packages, similar to the update provided by you on pages 5-7 of your testimony for letters and flats.

UPS/USPS-T4-8. Please provide an update on the equipment used to apply and/or sort barcodes for Priority Mail packages, similar to the update provided by you on pages 5-7 of your testimony for letters and flats.

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UPS/USPS-T4-9. (a) Please provide a complete description, similar to that given on page 9, line 9, through page 10, line 2, of your testimony, of the future system or systems for processing and transporting Priority Mail.

(b) Are the various shapes of Priority Mail (letters, flats, and packages) separated from each other and either processed or transported differently? If so, describe (1) how and at what point in the operation this separation takes place, (2) the cost of performing the separation operation, and (3) all differences in processing and in transportation by shape of mail.

(c) Are Priority Mail Flat Rate Envelopes separated from Priority Mail packages and either processed or transported differently from each other? If so, please describe (1) how and at what point in the operation this separation takes place, (2) the cost of performing the separation operation, and (3) all differences in processing and in transportation between Priority Mail Flat Rate Envelopes and Priority Mail packages.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in
accordance with section 12 of the Commission's Rules of Practice.


John E. McKeever

Dated: August 1, 1997
Philadelphia, Pa.